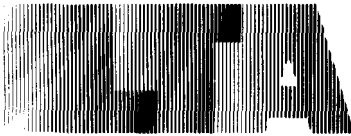


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SEP 10 1991

Federal Communications Commission  
Office of the Secretary



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10 LY.  
September 8, 1991

ORIGINAL  
FILE

Ms. Donna Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: RM-7771 of Constellation Communications, Inc. and RM-7773 of TRW Inc.

Dear Ms. Searcy:

Attached is a request of Loral Cellular Systems, Corp. for an extension of time in which to comment on the above-referenced rulemaking petitions.

If you have any questions, please contact the undersigned.

Sincerely yours,

Leslie A. Taylor

cc: Raymond LaForge, Office of Engineering and Technology  
Fern Jarmulnek, Common Carrier Bureau

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SEP 10 1991

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of:

Petitions for Rulemaking of  
Constellation Communications, Inc.  
TRW Inc.

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RM No. 7771  
RM No. 7773

To Amend the Commission's Rules with  
regard to Low-earth Orbit Satellite  
Systems Operating in the RDSS Bands

Petition of Loral Cellular Systems, Corp.  
for Consolidated Pleading Cycle

Loral Cellular Systems, Corp. (LCSC), by its attorney, respectfully requests that the comment period in the above-captioned rulemaking be extended from September 12, 1991 to October 10, 1991, or a period concurrent with the comment period on the petitioners' applications to construct low-earth orbit communications satellite systems.

LCSC submits that a consolidation of the comment period is in the public interest for the following reasons:

(1) the applications of petitioners are two of a group of applications to be considered pursuant to the Commission's Public Notice DA 91-407, Report No. DS-1068, released April 1, 1991, establishing a processing group for radiodetermination satellite service (RDSS) system proposals;

(2) many of the issues addressed by the rulemaking petitions are addressed in the applications of the petitioners, as well as the applications of other parties, including that of LCSC;

(3) consolidated comments on the rulemaking petitions and the applications will enable parties to file one set of comments, instead of two, addressing the same or similar issues raised by the rulemaking petitions and the applications;

(4) the original Public Notice issued by the Commission did not clearly indicate that comments were being sought solely on the rulemaking request; and a clarifying public notice was issued on August 29, 1991 indicating that the requests for Pioneer's Preference would be considered separately. This confusion has led to a delay in LCSC's evaluation of the rulemaking petitions.

(5) the Commission's resources, as well as those of commenting parties, would be conserved by utilizing a consolidated pleading cycle.

LCSC counsel has been advised by counsel for Constellation Communications, Inc., that it has no objection to an extension of time in this matter. LCSS counsel has advised counsel for TRW Inc. of this filing.

Wherefore, for the forgoing reasons, LCSC requests an extension of time and consolidated pleading cycle for filing comments with regard to RM-7771 and RM-7773.

Respectfully submitted,

LORAL CELLULAR SYSTEMS, CORP.

By: Leslie A. Taylor

Leslie A. Taylor  
Its Attorney

September 10, 1991

Leslie A. Taylor  
Leslie Taylor Associates  
6800 Carlynn Court  
Bethesda, MD 20817  
(301) 229-9341

CERTIFICATE OF SERVICE

I, Andrew Taylor, hereby certify that I have on this <sup>10</sup>~~9~~<sup>th</sup> day of September, 1991 caused to be sent copies of the foregoing "Petition of Loral Cellular Systems, Corp. for Extension of Time" by U.S. mail, postage prepaid, to the following:

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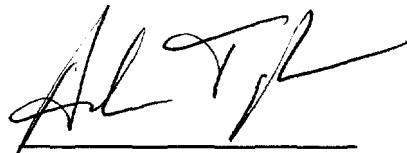
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